REMARKS

Claims 29-57 were pending in the present application. Claims 44, 51 and 55-57 were cancelled. Accordingly, claims 29-43, 45-50 and 52-54 are now pending in the application.

Claim 37 stands rejected under 35 U.S.C. §112, 1st paragraph, as failing to comply with the enablement requirement. Although the Applicant respectfully traverses this rejection, the Applicant has amended claim 37 to be clearer. Support for claim 37 may be found at page 8, lines 16-20 of the specification, which discloses

"It should be noted that even though the discussion herein makes references to communications between the client domains 415(1-4) and the SRDs 410(1-2), typically only one of the two SRDs 410(1-2) manages the client domains 415(1-4) during any given time. Although, in an alternative embodiment, it may be possible that both of the SRDs 410(1-2) may allow one or more client domains 415(1-4) to communicate with each other during any given time."

Claims 29-57 stand rejected under 35 U.S.C. §102(e) as being anticipated by Gillett Jr. et al. (U.S. Patent Number 6,295,585) (hereinafter 'Gillett Jr.').

The Applicant's invention is directed toward systems capable of being partitioned or "domained" for error isolation between nodes. As such, these nodes are typically prevented from communicating with each other. However, to facilitate communication between two nodes in different domains, a shared resource domain including a shared resource device is used to transfer the data between the two nodes and to access resources of other nodes in response to a request to do so.

Applicants claim 29, as amended, recites

"a method comprising:

a first client device belonging to a first client domain, includes a first processor executing a first operating system;

a second client device belonging to a second client domain, includes a second processor executing a second operating system; and

a shared resource device belonging to a shared resource domain, includes a third processor executing software for managing communications between the first client device and the second client device by:

receiving a request from the first client device of the first client domain to access the second client domain; and

domain in response to receiving the request from
the first client device of the first client domain;
isolating the first client domain, the second client domain and the shared
resource domain from one another such that errors in a given
domain do not affect the remaining domains." (Emphasis added)

Gillett Jr. is directed to a high-performance communication method and apparatus for write-only networks. Gillett discloses at col. 2, lines 14-21

"a method for providing shared memory in a network including a plurality of nodes coupled by a data link includes the steps of <u>allocating a portion of memory at each of the plurality of nodes to provide a shared memory for storing a plurality of data items, wherein a subset of the data items of the shared memory are writable by a subset of the plurality of nodes." (Emphasis added)</u>

Gillett Jr. also discloses at col. 3, line 63 through col. 4 line 1

"The node memories 24, 24a, 24b and 24c are apportioned into at least two distinct portions. One portion of node memory is used to store data that is accessed only by the associated node, and is hereinafter referred to as the local memory portion. The second portion is used to store data that may be accessed by any node in the network. The second portion is hereinafter referred to as the network memory portion." (Emphasis added)

From the foregoing, it is clear that Gillett Jr. allows a node to communicate directly with a memory resource belonging to another node. Thus, Gillett Jr. teaches away from and is in contrast to the Applicant's invention. Accordingly, the Applicant submits that Gillett Jr. does not teach "a shared resource device belonging to a shared resource domain, includes a third processor executing software for managing communications between the first client device and the second client device by: receiving a request from the first client device of the first client domain to access the second client

domain; and accessing the second client device of the second client domain in response to receiving the request from the first client device of the first client domain," as recited in Applicant's claim 29.

Accordingly, the Applicant submits that claim 29, along with its dependent claims, patentably distinguishes over the Gillett Jr.

In addition, Gillett Jr. does not teach or disclose a system comprising:

"a first client device belonging to a first client domain, ...

a second client device belonging to a second client domain, ...

a shared resource device belonging to a shared resource domain, ...

wherein the shared resource device is configured to:

receive a request from the first client device of the first client

domain for data that is storable in a resource associated

with the second client device belonging to the second client
domain:

access the data from the resource associated with the second client device belonging to the second client domain; transfer the data to the first client device of the first client

domain; and

provide an indication to the first client device of the first client domain in response to transferring the data;

wherein the first client domain, the second client domain and the shared resource domain are isolated from one another such that errors in a given domain do not affect the remaining domains" as recited in Applicant's claim 38. (Emphasis added)

Thus, the Applicant submits that claim 38, along with its dependent claims, patentably distinguishes over the Gillett Jr.

In addition, Applicant submits that Gillett Jr. does not teach or disclose an article comprising

"one or more machine-readable storage media containing instructions that when executed enable a processor to:

provide a request from a first client device belonging to a first client

domain to a shared resource device belonging to a shared
resource domain to access one or more resources belonging to a
second client domain;

access the one or more resources in the second client domain in response to receiving the request; and provide an indication to the first client domain in response to accessing the one or more resources in the second client domain; isolate the first client domain, the second client domain and the shared resource domain from one another such that errors in a given domain do not affect the remaining domains." (Emphasis added)

Thus, Applicant believes that claim 48, along with its dependent claims, patentably distinguishes over Gillett Jr. for at least the reasons given above.

CONCLUSION

Applicant submits the application is in condition for allowance, and an early notice to that effect is requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-53000/BNK.

Respectfully submitted,

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